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U.S. BANK NATIONAL ASSOCIATION,  
AS TRUSTEE FOR GSAA HOME EQUITY  
TRUST 2006-20, ASSET-BACKED  
CERTIFICATES, SERIES 2006-20,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 2:21-cv-00257-JAD-EJY

**STIPULATION AND  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO RENEWED MOTION FOR  
REMAND [ECF No. 29]**

**(First Request)**

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On February 16, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-832212-C [ECF No. 1-1];
2. On February 16, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On May 3, 2021, U.S. Bank filed a Motion for Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10];
4. On July 23, 2021, the Court entered an order, pursuant to the Parties’ stipulation, staying the case pending resolution of *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.* Ninth Cir. Case No. 19-17332 (the “*Wells Fargo II Appeal*”). Upon entry of the stay the Court terminated all active motions. The Court further ordered that the Parties to move to lift the stay, reopen the case, and reactivate any previously filed motions within 30 days of issuance of the mandate in the *Wells Fargo II Appeal* [ECF No. 27];
5. On December 28, 2021, U.S. Bank filed a Renewed Motion for Remand;
6. Chicago Title’s deadline to respond to U.S. Bank’s Renewed Motion for Remand is currently January 11, 2022;
7. Chicago Title’s counsel is requesting an extension until February 9, 2022, to file its response to the pending Renewed Motion for Remand;
8. Chicago Title requests a brief extension of time to respond to the Motion for Remand to afford Chicago Title additional time to respond to the legal arguments set forth in U.S. Bank’s motion;
9. U.S. Bank does not oppose the requested extension;
10. This is the first request for an extension which is made in good faith and not for purposes of delay;

///

1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion  
2 for Remand [ECF No. 29] is hereby extended through and including February 9, 2022.

3  
4 Dated: January 10, 2022

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

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6 By: /s/-- Sophia S. Lau  
SCOTT E. GIZER  
SOPHIA S. LAU  
7 Attorneys for Defendant CHICAGO TITLE  
8 INSURANCE COMPANY

9 Dated: January 10, 2022

SINCLAIR BRAUN LLP

10 By: /s/-Kevin S. Sinclair  
11 KEVIN S. SINCLAIR  
Attorneys for Defendant CHICAGO TITLE  
12 INSURANCE COMPANY

13 Dated: January 10, 2022

WRIGHT FINLAY & ZAK, LLP

14 By: /s/-Lindsay D. Dragon  
15 LINDSAY D. DRAGON  
Attorneys for Plaintiff U.S. BANK  
16 NATIONAL ASSOCIATION

17 **IT IS SO ORDERED:**

18  
19 Dated: 1-12-2022

20 By:   
UNITED STATES DISTRICT COURT JUDGE